

EXHIBIT 70

Declaration of Melody Barnes

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF MELODY BARNES

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I, Melody Barnes, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am an African-American woman and a graduate of The University of North Carolina at Chapel Hill (UNC-CH). I earned a Bachelor of Arts with Honors in History from UNC-CH in 1986, and a Juris Doctorate from The University of Michigan Law School in 1989.

2. I began my career as an attorney with the law firm of Shearman & Sterling in New York City as an associate in corporate finance and financial institutions.

3. From December 1995 until March 2003, I worked for Senator Edward M. Kennedy on the Senate Judiciary Committee. I served as Chief Counsel from 1998 until I left the Committee in 2003.

4. My professional experience also includes an appointment as Director of Legislative Affairs for the U. S. Equal Employment Opportunity Commission, serving as assistant counsel to the Subcommittee on Civil and Constitutional Rights of the House Judiciary Committee, and serving as a Principal at The Raben Group, a consulting firm.

5. I was the Executive Vice President for Policy at the Center for American Progress, a progressive research institute and think tank, before joining Senator Barack Obama's 2008 presidential campaign.

6. From January 2009 until January 2012, I was Assistant to the President and Director of the White House Domestic Policy Council. As Director of the Domestic Policy Council, I provided strategic advice to President Obama and worked closely with members of the Cabinet coordinating the domestic policy agenda across the Administration. Under my leadership, innovative new policies, practices, and partnerships were initiated to address significant national challenges, including education, health care, and the federal government's relationship with local governments and communities.

7. After leaving the White House, I started a consulting business. Currently, I am Co-Founder and Principal of MB2 Solutions LLC, a domestic strategy firm, and a senior fellow in presidential studies at the University of Virginia's Miller Center.

8. I also serve as an Independent Director on the Boards of Ventas, Inc. (NYSE:VTR); Booz Allen Hamilton Holding Corporation (NYSE:BHA); the Marguerite Casey Foundation; and Year Up. I chair the Aspen Institute Forum for Community Solutions and Opportunity Youth Incentive Fund, serve as Vice Chair of the Advisory Board of the Institute for Contemporary Art at Virginia Commonwealth University, and am a member of the Board of Trustees for the Thomas Jefferson Foundation that owns and operates Monticello.

9. My media appearances include *This Week with George Stephanopoulos*, *The Daily Show with Jon Stewart*, *Fareed Zakaria GPS*, *Charlie Rose*, *Morning Joe* and *the NewsHour*.

Experience at UNC-CH

10. I am from Richmond, Virginia. My father was a civilian employee with the U.S. Army and my mother was a curriculum specialist and administrator in the Richmond Public Schools System.

11. I was a successful high school student, and I eagerly sought a University experience in a new environment where I could challenge myself and my track record of past accomplishments. I saw UNC-CH as an opportunity to grow.

12. I fell in love with UNC-CH after visiting with my parents. UNC-CH had an excellent reputation and a highly regarded history department. After four years, I believed I would be well prepared to apply for law school.

13. Prior to attending UNC-CH, I was fortunate to attend school and build strong friendships with a wide range of individuals whose backgrounds did not mirror my own. That helped my transition to UNC-CH and made my experience more meaningful and expansive than it would have been otherwise.

14. However, not all of my peers had similar experiences, and some appeared to struggle to build a diverse community or take full advantage of all UNC-CH had to offer.

15. I met a range of people while at UNC-CH. I lived with two white women from North Carolina during my freshman and sophomore years at UNC-CH and had a diverse group of friends in the dorms. I participated in Campus Y (a campus organization focused on social justice) and other organizations because of people I met. I was able to

contribute to UNC-CH in a broad way and had a much richer experience because of the diversity of people I met at UNC-CH.

Experience After UNC-CH

16. My exposure to diverse groups of people and to a wide-range of experiences – including exposure in college – has been important to my success and to my ability to lead in professional environments.

17. One of the things that creates capacity for leadership is cross-cultural experience. Early cross-cultural experiences are the prerequisites to developing respect and appreciation for diverse opinions and experiences. They broaden the aperture to help us wrestle with complexity and approach problem-solving with greater creativity. With these critical badges of leadership, one is better able to build a robust network and achieve success in all fields, including business, academia, science and technology, public policy, the arts and beyond.

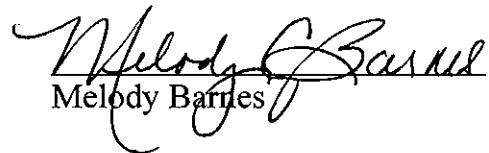
18. My cross-cultural experiences have been essential to my professional success. As a chief counsel on the Senate Judiciary Committee and as Director of the White House Domestic Policy Council, those experiences were important to understanding – and developing solutions to address – the challenges facing our country. My education at UNC-CH and particularly my exposure to a diverse community of students and faculty were essential preparation for my role as policy advisor.

CONCLUSION

19. Our world is becoming more diverse, and if we want UNC-CH graduates to be successful individuals and leaders, UNC-CH must continue to expose its students to classmates from different backgrounds who have different experiences than their own.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7 August 2017


Melody Barnes